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August 3, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222, STOP CODE: 1170
Washington, D.C. 20006

Re: Ex Parte Communication in PR Docket No. 93-61
Automatic Vehicle Monitoring (AVM)

Dear Mr. Caton:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, notice is hereby given of an *ex parte* communication regarding the above-referenced proceeding. An original and one copy of this letter and its attachments are being filed with the Secretary's Office.

Late yesterday afternoon, Richard E. Wiley, Michael A. Lewis and I of this firm met with Ralph Haller, Chief of the Private Radio Bureau, and F. Ronald Netro, Engineering Advisor to the Chief of the Private Radio Bureau. We discussed the positions advanced by Amtech and Pinpoint in this proceeding including band plans. We also discussed a band plan modeled after that proposed in the *Notice of Proposed Rulemaking* and referred to in the attached diagram as "Modified NPRM Band Plan." In the Modified NPRM Band Plan, we recommended that, within the 902 - 928 MHz band, emissions be allowed to fall off gradually at the sub-band edges so that 43 + 10 log (Power) dB attenuation would apply at two MHz on either side of the eight MHz wide-area sub-bands, so as to permit more efficient use of the wide-area sub-bands. Similarly, the local-area systems should be able to roll off gradually at the 912 MHz sub-band demarcation point so as to facilitate the use of up to three channels for wideband tag operations.

By placing those wide-area systems that cannot time share at 904 - 912 MHz and those that can time share at 918 - 926 MHz, the Commission would further the development of competing wide-area AVM technologies. At the same time, local-area system options and the development of high data rate wideband local-area technologies such as those called for by the California Department of Transportation specification would be enhanced by permitting the local-area and wide-area systems to share 918 - 926 MHz on a height power differential basis. Part 15 system designers would continue to know that the wide-area systems would operate in

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the same longstanding sub-bands and that interference protection would therefore not have to be accorded such systems outside of the sub-bands.

Notwithstanding our discussion of the Modified NPRM Band Plan, we noted that the band plan attached hereto and referred to as "Pinpoint's Modification to the Teletrac Ex Parte Band Plan" is preferable.

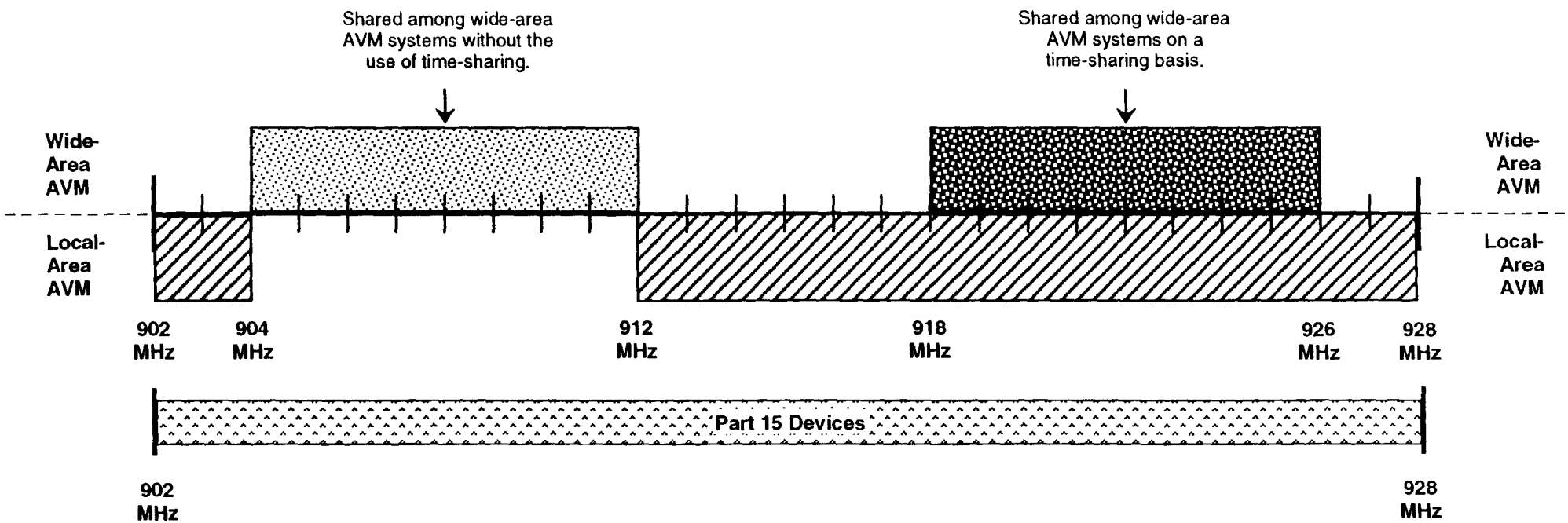
Copies of illustrations showing the band plans we presented to Mr. Haller and Mr. Netro are attached hereto. If there are any questions regarding this matter, please contact me.

Respectfully submitted,

David E. Hilliard
Attorney for Amtech Corporation and for
Pinpoint Communications, Inc.

Attachments
cc: Mr. Ralph Haller
Mr. F. Ronald Netro

Modified NPRM Band Plan



Shared among wide-area AVM systems without the use of time-sharing.

Shared among wide-area AVM systems on a time-sharing basis.

Local-area AVM

Part 15 Devices

Notes:

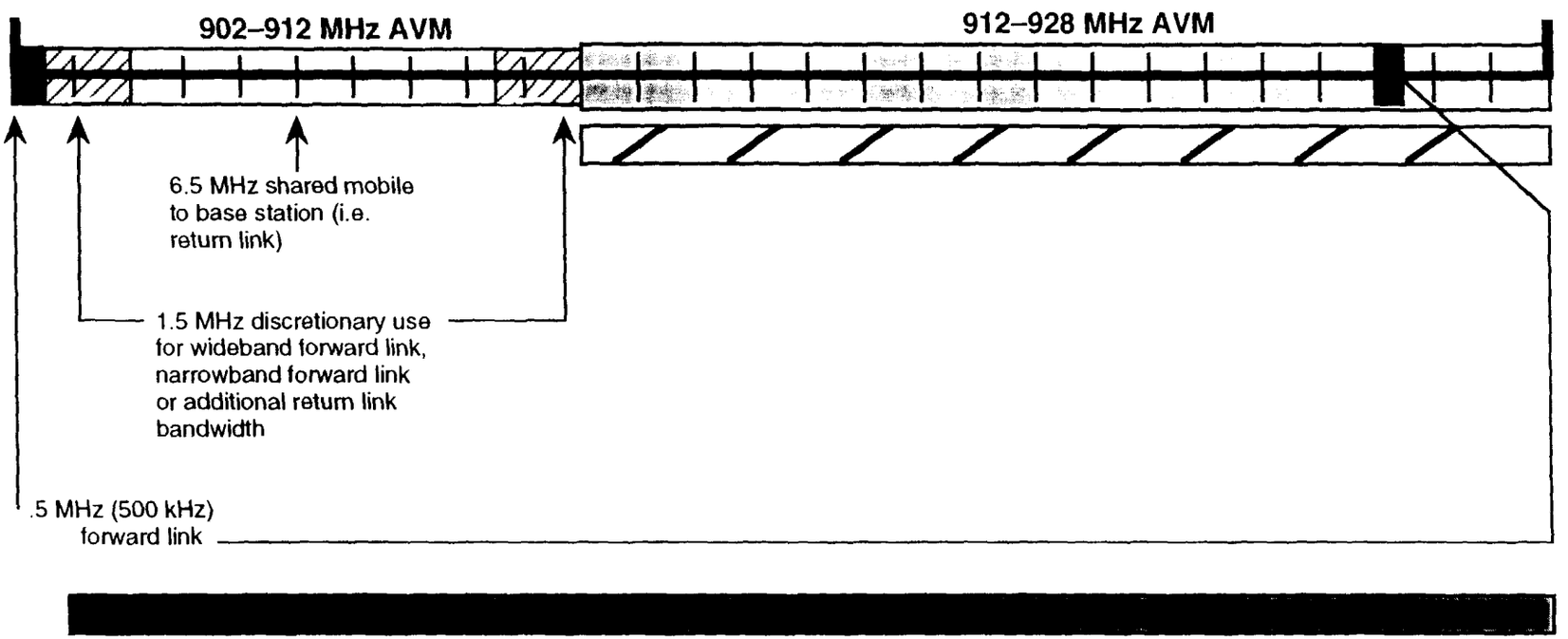
1. Wide-area forward links are to be located in the sub-band in which a licensee's wideband pulse is generated.

2. Local-area AVM and wide-area AVM would share at 918–926 MHz on a height-power differential basis pursuant to Section 90.173(b) of the Commission's Rules. Thus, the local-area systems would not time-share with wide-area AVM systems.

Teletrac's *Ex Parte* Band Plan

(January 26, 1994, *ex parte*; March 15, 1994, Comments, p. 11 n.11)

902 MHz Wide-area pulse-ranging systems that cannot time share as primary users. **912 MHz** Local Area Systems (Tags) TAG Systems and Wide-Area LMS Systems on a Co-Primary Basis. **928 MHz**



Unlicensed Part 15 Devices

Pinpoint's Modification to the Teletrac *Ex Parte* Band Plan

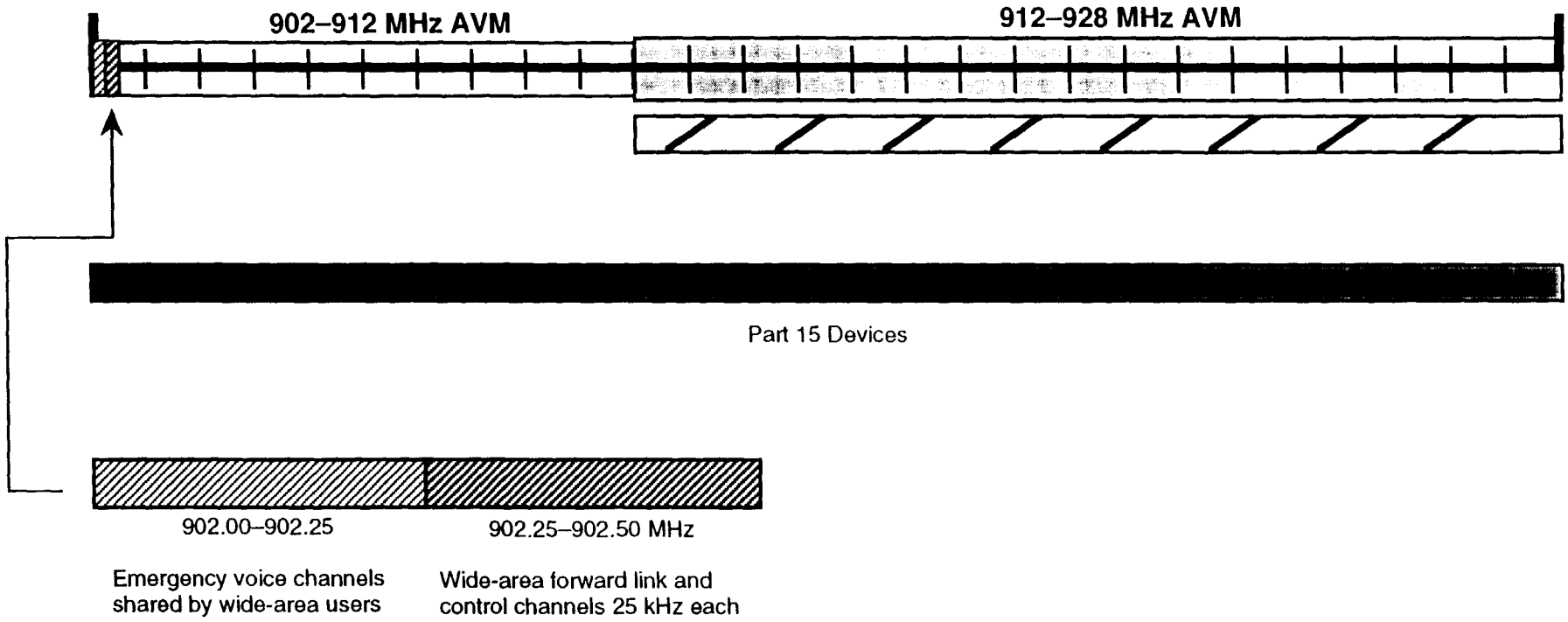
902 MHz

Wide-area pulse-ranging systems that cannot time share as primary users.

Local Area Systems (Tags)

TAG Systems and Wide-Area LMS Systems on a Co-Primary Basis.

928 MHz



As an accommodation to TAG (local-area) systems using wide bandwidth, *e.g.*, the 6 MHz systems described by TI/MFS and AMTECH, Pinpoint proposes that the 910–912 MHz band be available, on a co-primary basis, for the sideband attenuation of wideband local-area signals centered at or above 912 MHz subject to more strict power limits than would apply to TAG systems at 912-928 MHz.